

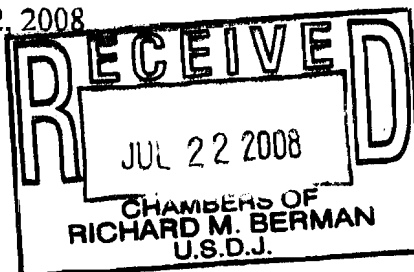


U.S. Department of Justice

United States Attorney
Southern District of New York**MEMO ENDORSED**The J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

p.2

July 22, 2008

BY FACSIMILEThe Honorable Richard M. Berman
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007Re: United States v. James Christo and Remila Christo
07 Cr. 818 (RMB)

Dear Judge Berman:

The Government, with the consent of both defendants, respectfully requests that the conference scheduled to take place before Your Honor on Wednesday, July 23, 2008 be adjourned until September 3, 2008, or as soon thereafter as is convenient for the Court. As the Court is aware, defendant James Christo recently retained new counsel to represent him in this matter. Since entering the case, defendant's new counsel has sent several letters to the Government seeking additional discovery. The Government has spoken with defense counsel and informed him that it is assembling documents responsive to some of the defendant's requests and will be producing those documents this week. Once those documents are produced, defense counsel will need time to review them. In addition, the Government expects that there may be discussions at that point concerning a possible disposition of this matter. For these reasons, the Government, with the consent of both defendants, requests that the conference scheduled for tomorrow be adjourned.

The Government, with the consent of both defendants, also respectfully requests that time be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A), in the above-captioned case from today until the date of the adjourned conference. Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendants in a speedy trial because it will permit the Government to produce the additional discovery that has been requested, it will permit the defendants to review that discovery, and it will permit continued plea negotiations. A proposed order is attached.

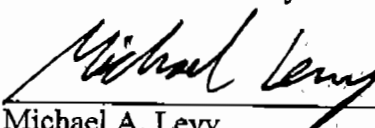
The Honorable Richard M. Berman
July 22, 2008

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Respectfully submitted,

MICHAEL J. GARCIA
United States Attorney

By:


Michael A. Levy
Assistant United States Attorney
(212) 637-2346

cc: Richard Lind, Esq.
William Moffitt, Esq.

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 7/22/08
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Conference is adjourned to
9-3-08 at 3:00 p.m.

SO ORDERED:

Date: 7-22-08


Richard M. Berman, U.S.D.J.